

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
BROOKLYN DIVISION**

RUSHDY HAUTER,

Plaintiff,

-against-

HSBC BANK USA, NATIONAL  
ASSOCIATION,

Defendant.

No. 1:19-cv-07036-FB-LB

**RULE 26(f) MEETING REPORT**

**CASE NAME:** *Rushdy Hauter v. HSBC Bank USA, National Association*

**DOCKET NO.:** 1:19-cv-07036-FB-LB

Have the parties met and conferred? \_\_\_ Yes \_\_\_ Date? \_March 2, 2020.

Date the Rule 26(a)(1) initial disclosures were exchanged? \_March 5, 2020.

Proposed Discovery Plan

1. Deadline for parties to provide properly executed authorizations/releases: N/A
2. Deadline to join new parties or amend the pleadings: April 13, 2020
3. Should any changes be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule?<sup>1</sup> Yes \_\_\_ No X
4. Deadline to file any protective order: May 13, 2020

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<sup>1</sup> If yes, the parties should be prepared to address the proposed changes at the initial conference.

5. The parties shall complete all fact discovery by: December 15, 2020
6. The parties shall complete expert discovery, if necessary, by: February 17, 2021
7. The parties shall file any pre-motion conference request by:<sup>1</sup> March 2, 2021
8. Should the Court hold an early settlement conference in this action?<sup>3</sup> Yes \_\_\_ No X
9. Have the parties agreed to a plan regarding electronic discovery?<sup>2</sup> Yes X No \_\_\_

The parties do not anticipate a dispute over preservation, scope, and production of ESI. Although all or most discovery will be electronic, the discovery will be produced as standard .pdf files for documentary production and .wav and .mp3 for audio recordings.

10. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636?<sup>3</sup>  
(Answer no if any party declines to consent without indicating which party has declined)  
Yes \_\_\_ No X

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<sup>1</sup> The parties are reminded to comply with the individual rules of the presiding district court judge.

<sup>3</sup> Prior to the initial conference, counsel shall discuss with their clients and their adversaries whether an early settlement conference, or other form of alternative dispute resolution, is appropriate in this case and be prepared to explain their reasons to the Court.

<sup>4</sup> If yes, the parties shall file a letter detailing the parties' proposed plan regarding electronic discovery.

<sup>5</sup> The fillable consent form AO 85 is available at [https://www.nyed.uscourts.gov/forms/allforms/general\\_forms](https://www.nyed.uscourts.gov/forms/allforms/general_forms) and must be signed by all parties and filed electronically.